Application of 7.5.5.2.1

Transmitted by the Government of France

Introduction

1. In paragraph 7.5.5.2.1 of ADR, limitations are given for the carriage of explosive substances contained in dangerous goods. Those limitations are all under 16 tons of maximum permissible net mass of explosive goods per transport unit, except for empty uncleaned packagings and Compatibility group 1.4S substances.

2. Paragraph 1.1.4.2 states that it is permitted to accept for carriage in a transport chain including maritime carriage some packages, containers, portable tanks and tank-containers, which do not entirely meet the requirements for packing, mixed packing, marking, labelling of packages or placarding and orange plate marking of ADR, but are in conformity with the requirements of the IMDG Code, under certain conditions.

3. The IMDG Code does not require any mass limitation per transport unit for the carriage of a Class 1 substance by sea mode. Therefore the limitation per transport unit during the delivery of the substance before or after the maritime trip is problematic.

Interpretation

4. We would like to ask the Working Party whether paragraph 1.1.4.2 allows containers that are meant to be carried on a ship to infringe paragraph 7.5.5.2.1 mass limitation per transport unit during their delivery to/from the ship.